

August 18, 2008  
8200-FY09-028

Department of Environmental Quality  
Division of Water Quality  
Cannon Health Bldg.  
288 North 1460 West  
Salt Lake City, UT 84116-3231

**Re: Comments on Proposed R317-2, Proposed Water Quality Standards Amendments**

Dear Dr. Moellmer:

ATK (ATK Launch Systems, Promontory facility) resubmits the attached comments. These comments were submitted February 2, 2007, and ATK believes that they remain valid in light of the proposed rule changes. ATK requests that the two proposals given in the attached comments be considered, a site specific standard for the TDS in Blue Creek, and/or a classification change for the referenced stream segment of Blue Creek.

ATK appreciates the opportunity to submit these suggestions. Please call me with any questions at (435) 863-8490, or Blair Palmer at (435) 863-2430.

Sincerely,



David P. Gosen, P.E.  
Director, Environmental Services

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DIVISION OF  
WATER QUALITY



DWQ-2008-001405  
Document Date: 08/18/2008

Launch Systems Group  
P.O. Box 707  
Brigham City, UT 84302

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February 2, 2007  
8200-FY07-075

Department of Environmental Quality  
Division of Water Quality  
Cannon Health Bldg.  
288 North 1460 West  
Salt Lake City, UT 84116-3231

**Re: Comments on Proposed R317-2-14 - Proposed Rule Change for TDS Standards in Class 4 Waters**

Dear Dr. Moellmer:

ATK (ATK Launch Systems, Promontory facility) submits the following comments on the proposed changes to the state water quality standards, specifically the numeric criteria changes for TDS in Class 4 waters. ATK Promontory currently discharges treated wastewater under UPDES permit #UT0024805 to Blue Creek. Blue Creek is characterized as a Class 4 water for agricultural use. Under the existing water quality rules, the Division of Water Quality can adjust TDS standards provided the adjustment does not impair the designated beneficial use of the receiving waters. Under the proposed rules, the established standards would be limited to the irrigation numeric criterion of 1200 mg/L unless the permittee can establish that natural or unalterable conditions prevent its attainment. As described below, the proposal has the potential to constrain discharges to receiving waters that are not used for irrigation and are, therefore, inappropriately classified.

ATK Promontory has 15 years of data from sampling upstream of the property boundary along Highway 83. This data show an average TDS concentration of approximately 4,300 mg/l. (Graphic depictions of the data are attached.)

DWQ findings have concurred with ATK Promontory's data. Specifically (and as part of the ATK Promontory UPDES permit renewal during the summer of 2004), DWQ performed a waste-load analysis for Blue Creek. DWQ independently sampled and calculated an upstream TDS value of 4343 mg/l as the input for that analysis.

In light of the facts, ATK Promontory proposes that DWQ include the following corresponding site-specific standards or a classification change for Blue Creek as part of the current proposed rule change:

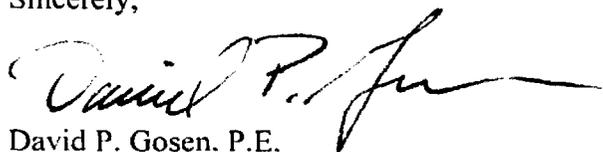
1. Add a site specific standard in R317-2-14 for TDS in Blue Creek from the Great Salt Lake to Blue Creek Reservoir of not less than 4,343 mg/L (thereby consistent with DWQ data supporting these concentrations as natural, un-altered conditions); and/or

2. Remove the Class 4 protection from the Blue Creek stream segment of the Great Salt Lake to the north boundary of our facility along Highway 83 since there is no irrigation from Blue Creek in this stream segment.

As DWQ is aware, the implications of applying the irrigation standard (or even the higher stock watering standard) to Blue Creek could trigger enormous water treatment expenditures currently estimated at more than \$1.25 million dollars. Those improvements would provide no benefit to Blue Creek and could involve challenging sludge disposal and other treatment-related issues.

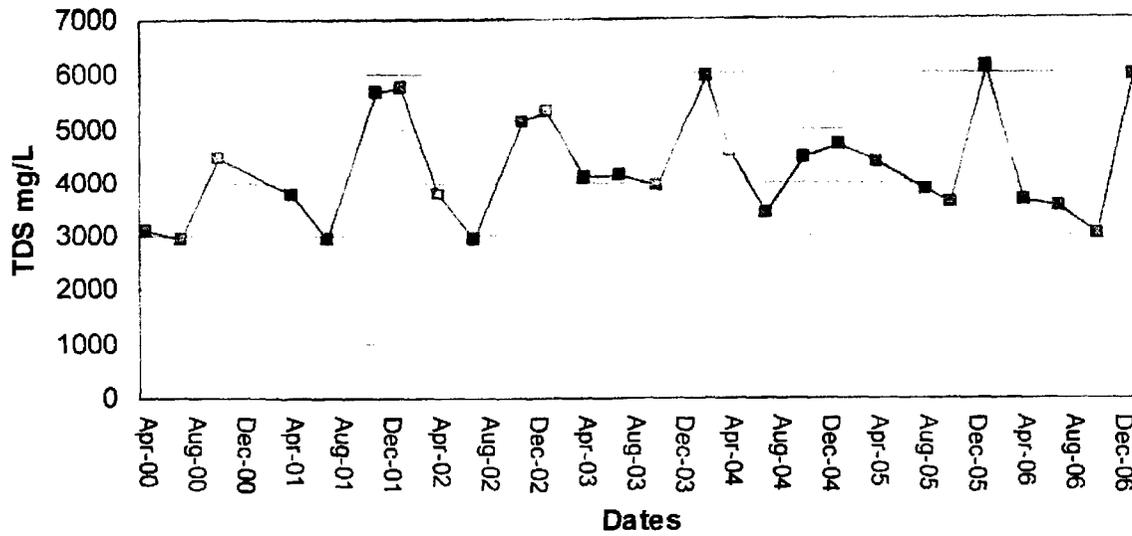
ATK appreciates the opportunity to submit these suggestions. Please call me with any questions.

Sincerely,



David P. Gosen, P.E.  
Director, Environmental Services

### Blue Creek TDS Conc. 2000-2007



### Blue Creek TDS Conc. 1989-1997

